

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 14-0175 WHA

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC
COMPANY,


**FURTHER QUESTIONS TO BE
ANSWERED BY PG&E BY
DECEMBER 19**

Defendant.

By **DECEMBER 19 AT NOON** PG&E shall please answer these questions:

7. What was the purpose of the hold-down anchor on the Adjacent Tower?
8. Was that hold-down anchor used on the Caribou-Palermo Transmission Line? If so, was there any support between the C-hook that lost the anchor and the C-hook that failed?
9. In what possible ways did the failure of the hold-down anchor on the Adjacent Tower contribute to the failure of the C-hook on the Incident Tower?
10. Generally, what factors exacerbate the gouging of the C-hooks (like sway, vibration, weight) and to what extent were these factors known by PG&E before the Camp Fire?

Dated: December 6, 2019.


WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE